



201-15863

The Dow Chemical Company
Midland, Michigan 48674
USA

1803 BUILDING
March 31, 2005

Via Certified Mail 7000 1530 0005 1754 9377

Jim Willis (7405M)
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue NW
Washington, DC 20460

Diane Sheridan (7405M)
USEPA Headquarters
Ariel Rios Building
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Washington, DC 20460

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ATTENTION CHEMICAL RIGHT-TO-KNOW PROGRAM: HPV CHALLENGE

The Dow Chemical Company supports and is an active participant in the HPV Challenge Program, the ICCA Initiative and OECD SIDS through the U.S. EPA and other jurisdictions.

The chemical substances listed below were previously volunteered by Dow with Monsanto to the HPV challenge (see attached letter dated November 23, 1999).

On April 30, 2002, Monsanto Company submitted a letter to EPA assuming sole sponsorship for these two substances (see Monsanto letter dated April 30, 2002). Therefore, these substances should be removed from the 55th ITC List.

On May 1, 2002, Dow sent a letter to EPA stating it was withdrawing its sponsorship for these substances because Dow no longer produces either substance.

Sincerely,

Linda C. Burgert
PH: 989-636-1011
FAX: 989-638-9933
E-MAIL: lburgert@dow.com

jt

cc: Jim Keith, American Chemistry Council, Arlington, VA
Steve Russell, American Chemistry Council, Arlington, VA

Attachments (3)



1803 BUILDING
May 1, 2002

The Dow Chemical Company
Midland, Michigan 48674

CERTIFIED MAIL RETURN RECEIPT REQUESTED 7000 0600 0025 5632 3513

Christine T. Whitman, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Charles M. Auer (7405)
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

ATTENTION CHEMICAL RIGHT-TO-KNOW PROGRAM: HPV CHALLENGE

The Dow Chemical Company (Dow) is providing notification to EPA that Dow no longer produces two substances, identified below, and previously sponsored by Dow with Monsanto to the ICCA Initiative.

Monsanto and Dow have agreed that Monsanto will assume sole sponsorship for these substances to the ICCA Initiative. A copy of the letter from Monsanto confirming this sponsorship is attached. Therefore Dow is withdrawing its sponsorship for these substances because Dow no longer produces either substance.

CASRN 142-73-2	Acetic acid, iminodi-
CASRN 928-72-3	Acetic acid, iminodi-, disodium salt

Sincerely,

Linda C. Burgert
PH: 989-636-1011
FAX: 989-638-9933
E-MAIL: lburgert@dow.com

jt

Attachment

MONSANTO



MONSANTO COMPANY
800 NORTH LINDBERGH BLVD
ST. LOUIS, MISSOURI 63167
<http://www.monsanto.com>

April 30, 2002

Christine Todd Whitman, Administrator
US EPA
P. O. Box 1473
Merrifield, VA 22116

And Charles M. Auer (7405)
USEPA HQ
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, DC 20460

ATTENTION: RIGHT TO KNOW PROGRAM HPV CHALLENGE

Monsanto Company is providing notification to EPA that it will be assuming sole sponsorship for the two substances, identified below, previously sponsored by The Dow Chemical Company (Dow) along with Monsanto to the ICCA Initiative.

Dow is withdrawing its sponsorship for these substances because Dow no longer produces either substance. A copy of the letter from Dow confirming this change of sponsorship is attached.

Chemical Name: Acetic acid, iminodi-
CAS Number: 142-73-4

Chemical Name: Acetic acid, iminodi-, disodium salt
CAS Number 928-72-3

Please adjust your records accordingly.

Sincerely,

Clyde Livingston
Monsanto Company
Mail Zone A2ND
800 North Lindbergh Blvd.
St. Louis, MO 63167

Telephone: 314-694-1538
Telefax: 314-694-4028
E-mail: clyde.livingston@monsanto.com

CC: L. Burgert - Dow



HAMPSHIRE

Hampshire Chemical Corp.
45 Hayden Avenue, Suite 2500
Lexington, MA 02421-7994
(781) 869-3400 Fax (781) 860-5290

November 23, 1999

Carol Browner, Administrator
US Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116

Attention: Chemical Right-to-Know Program

Dear Administrator Browner:

This letter is to inform the Agency that two companies, Hampshire Chemical Corp., a subsidiary of the Dow Chemical Company and Monsanto Company have formed a consortium to address the High Production Volume Chemicals Challenge for the following category of chemicals:

Chemical	Chemical Name	Year
142-73-4	Iminodiacetic Acid	2001
928-72-3	Disodium Iminodiacetate	2001

We understand that our commitment entails: assembling and reviewing available test data, developing and providing test plans for each of the sponsored chemicals, and, when appropriate, conducting additional testing in the time frame established by the HPVC Program. We understand that the information and data provided under the HPVC Program will be made publicly available.

To the extent these chemicals are on the final list of chemicals in the International Council of Chemical Associations' (ICCA) initiative, the required analyses and data may be developed under that program.

The following company representatives will serve as the contacts for this consortium:

Paul T. Robbertz
Hampshire Chemical Corp.
A subsidiary of The Dow Chemical Company
45 Hayden Avenue, Suite 2500
Lexington, MA 02421

Telephone: 781-869-3428
Telefax: 781-860-5290
e-mail: pttrobbertz@Dow.com

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701 861 7436 P.03/07

Clyde L. Livingston
Monsanto Company
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St. Louis, MO 63167

Telephone: 314-694-1538
Telefax: 314-694-5182
e-mail: clyde.l.livingston@monsanto.com

Sincerely,

Hampshire Chemical Corp.

Paul T. Robbertz
Global EH&S Product and Operations Leader

Monsanto Company

Clyde Livingston
Chemical Regulatory Compliance

cc: L. Burgert - The Dow Chemical Company
M. Kozuch - The Dow Chemical Company
